

Muriel Goode-Trufant Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET NEW YORK, NEW YORK 10007

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May 6, 2025

BY ECF

Honorable Paul A. Engelmayer United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Adewale Olukayode, et al. v. The City of New York, et. al., 25-CV-01232 (PAE)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants City of New York ("the City"), Former Mayor Bill De Blasio, Former New York City Police Department Commissioner Dermot Shea, and Former New York City Police Department Chief of Department Terence Monahan (hereinafter "defendants") in the above-referenced matter. In that capacity, I write with the consent of plaintiffs' counsel, Elena Cohen, Esq., to respectfully request a 30-day enlargement of time from May 19, 2025 to and including June 18, 2025 within which defendants may answer or otherwise respond to the Complaint. This is the second request for an enlargement of time.

In the Complaint, plaintiffs allege, *inter alia*, that they were subjected to false arrest and/or excessive force on various dates. In accordance with defendants' obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations set forth in the Complaint. Plaintiffs provided defendants with the executed releases pursuant to New York Criminal Procedure Law § 160.50 on April 28, 2025, and defendants are still obtaining relevant documents we need to properly respond to the Complaint. Accordingly, defendants need additional time to access the information, evaluate the claims in the Complaint, and properly respond to the allegations therein.

In view of the foregoing, defendants respectfully request a 30-day extension of time, from May 19, 2025 to June 18, 2025, to answer or otherwise respond to the Complaint.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Jenny Weng

Jenny Weng Senior Counsel Special Federal Litigation Division

cc: Counsels of Record (By ECF)